REMARKS

After entry of this Amendment, claims 1-9 and 11 are pending in the application. Claim 10 has been cancelled without prejudice. Claims 1 and 11 has been amended to more particularly point out and distinctly claim the subject matter which applicant regards as the invention. Reconsideration of the Examiner's rejection is requested.

In the Office Action dated September 20, 2006, claims 1-9 and 11 stand objected to under 35 U.S.C. §132.(a) as introducing new matter into the disclosure. The Examiner asserts that recitation of the limitation that the electrolyte is "circulating through" under high pressure fails to have specific support in the specification. However, the Examiner indicates that the terms "pumped through" or "flows through" is supported by the specification. Without conceding Examiner's position (since applicant's position is that "pumped" is sufficiently broad to encompass "circulating"), claim 1 has been amended to now recite "pumped" rather than "circulating". The Examiner further asserts that the recitation of "chamber", "at least two", and "of sufficient size" recitations in claim 11 fail to have specific support in the specification. Without conceding Examiner's position (since applicant's position is that "pre-baffle chamber" is clearly shown in the Figure 3, and further the "pre-baffle" is sufficiently broad to encompass a "chamber"; that "at least two" is clearly shown in Figure 3, and further "two opposing sidewalls" is sufficiently broad to encompass "at least two"; and that "slightly larger than" an outer dimension is supported in the original specification at paragraphs [0019]-[0021], and further "slightly larger than" is sufficiently broad to encompass "a sufficient size"), claim 11 has been amended to eliminate the term "chamber" and phrase "at least". Claim 11 has been amended to replace "of sufficient size" with the phrase "slightly larger than an outer dimension". Reconsideration of the Examiner's objection to claims 1-9 and 11 is requested.

Claims 1-9 and 11 stand rejected under 35 U.S.C. §112 first paragraph as failing to comply with the written description requirement. It is submitted that claims 1 and 11 have been amended to overcome the objects raised by the Examiner. Reconsideration of the Examiner's rejection of Claims 1-9 and 11 under 35 U.S.C. §112, first paragraph is requested.

Claims 1-8 and 11 stand rejected under 35 U.S.C. §103(a) as being obvious over Angelini (U.S. Patent No. 3,852,170) in view of Doetzer et al (U.S. Patent No. 4,444,636). The Examiner asserts that it would have been obvious to one having ordinary skill in the art at the time the invention was made to have modified the invention of Angelini by using the galvanic cell of Doetzer et al., because it would suppress the entry of air and moisture to the electrolysis bath, thus preserving the conductivity and life of the electrolyte (citing Col. 1, lines 30-40 of Doetzer et al.). The Examiner asserts that Angelini teaches a plating device comprising at least one of a cell or plating tank (Figure 1, tank 29), a contact box (Figure 1, box 23') located after the cell in the direction of transportation, at least one partition (Figure 3, feature 29') separating the cell from the contact zone, and a seal (Figure 3, feature 57) surrounding the workpiece. The Examiner states that the seal or diaphragm 57 is capable of being operated without contacting the workpiece if air is not supplied to the supplying chamber 58. However, there is no teaching or suggestion in Angelini of not supplying air to the chamber 58. In fact, the Angelini reference specifically teaches contact seals in all disclosed configurations. The modification suggested by the Examiner is contrary to the specific teachings of the Angelini reference and therefore fails to provide a prima facie obviousness rejection. The addition of the Doertzer et al reference does not overcome this deficiency, since the Doetzer et al reference does not specify whether a contact or non-contact seal is obtained by the T-shaped connecting components 10 being provided with "appropriate openings, and these openings are matched as closely as possible to the cross-sectional configuration of the strip 2 in order to avoid as far as possible an emergence of electrolyte from the tubular cell 1 or from the T-shaped connecting components10". (See Doetzer et al, Col. 4, line65 – Col. 5, line 5). The Angelini reference, taken singularly or in any permissible combination with Doetzer et al, does not anticipate, teach or suggest that the seal is formed by a stripper plate held in place by static pressure of the electrolyte as recited in claims 5 and 11 of the present application. Rather, the Angelini reference teaches that the seal 57 is held in place by the cylindrical body 30 carried by plate 60 positioned within a channel or U-shaped notch 61 provided in each wall 29' of the processing tank 29 whin in use. (See Angelini, Col. 7, lines 34-46, and Figure 7). The Doetzer et al reference does not overcome this deficiency, since Doetzer et al teaches that the T-shaped connecting components are flange attached.

(See, Doetzer, Col. 4, lines 24-42). With regard to Claim 2, feature 30 of Angelini there is no teaching or suggestion how the feature 30 of Angelini would surround the outlet of the jet cell 1 of Doetzer et al. With regard to Claim 3, the Examiner asserts that Angelini discloses a pre-baffle feature 30 in Figure 7, however there is no teaching or suggestion of how the cylinder feature 30 of Angelini would act as a mount for the seal 17 of Doetzer et al.. The prebaffle 30 is defined in the Angelini specification as a sealing device 30 in exit tank wall 29' (see column 5, lines 56-57). The Examiner's interpretation of Claim 4 is inconsistent with the teaching of the Angelini device. In particular, the Angelini device teaches air pressure supplied through tube 59 (Figure 7) into chamber 58 in order to expand diaphragm 57 into engagement with the outer surface of the workpiece 10. This provides contact engagement and positive sealing. However, the prebaffle does not create a back-pressure in tank 29, since atmospheric pressure tank 29 does not operate as a pressure vessel. With regard to Claim 5, the Examiner asserts that Angelini teaches a plating device wherein the seal is formed by a plate referring to column 7, lines 47-52. The plate type configuration referred to in column 7, lines 47-52 is further described in column 8 starting at line 51, where it indicates that bar 138 is surrounded throughout its profile by a double row of flexible blades 139 which are staggered relative to blades in an adjoining row so that one blade in a row will bridge the spacing between two adjoining blades in the other row. As clearly seen in Figure 18, this discloses a contact type seal. This disclosure does not provide a prima facie obviousness rejection of claim 5. The combination of references cited by the Examiner fails to anticipate, teach or suggest the specific structural configurations recited in claims 1-9 and 11. Claims 5 and 11 also recites that the stripper plate is held in place by static pressure of the electrolyte. This specific structural configuration is not anticipated, taught or rendered obvious by the Angelini reference taken singularly or in any permissible combination with Doetzer et al.. Reconsideration of the Examiner's rejection is requested.

Claims 9 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Angelini in view of Doetzer et al and further in view of Labinski et al. The addition of the Labinski et al reference does not overcome the deficiencies of the combination of Angelini in view of Doetzer et al as described in greater detail above. More particularly, the Labinski et al reference taken singularly or in any

permissible combination does not anticipate, teach or suggest a seal having a non-contact opening slightly larger than the an outer perimeter of the work piece and/or the seal held in place by static pressure of the electrolyte as recited in the claims of the present application. Reconsideration of the Examiner's rejection is requested.

It is respectfully submitted that this Amendment traverses and overcomes all of the Examiner's objections and rejections to the application as originally filed. It is further submitted that this Amendment has antecedent basis in the application as originally filed, including the specification, claims and drawings, and that this Amendment does not add any new subject matter to the application. Reconsideration of the application as amended is requested. It is respectfully submitted that this Amendment places the application in suitable condition for allowance; notice of which is requested.

If the Examiner feels that prosecution of the present application can be expedited by way of an Examiner's amendment, the Examiner is invited to contact the Applicant's attorney at the telephone number listed below.

Respectfully submitted,

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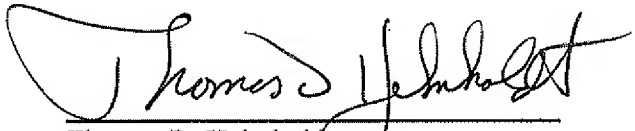
& HELMHOLDT, P.C.



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